

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ Delta, LLC,  
*Plaintiff*,

v.

CommScope Holding Company, Inc., *et al.*,  
*Defendants*.

Civil Action No.: 2:21-CV-00310-JRG  
(Lead Case)

TQ Delta, LLC,  
*Plaintiff*,

v.

Nokia Corp., *et al.*,  
*Defendants*.

Civil Action No.: 2:21-CV-00309-JRG  
(Member Case)

**DECLARATION OF RUDOLPH FINK IV**

I, Rudolph Fink IV, state as follows in support of Plaintiff TQ Delta, LLC's Response to Defendants' Opposed Second Motion for Entry of Order Focusing Patent Claims:

1. I am a partner at the The Davis Firm, P.C. and counsel of record for TQ Delta, LLC. I am a member of good standing of the State Bar of Texas. I have personal knowledge of the facts set forth in this Declaration.
2. Exhibit A contains true and correct copy of Nokia Defendants "Amended Invalidity Contentions and Prior Art Elections," received on July 28, 2022.
3. Exhibit B contains true and correct copy of CommScope Defendants "Preliminary Election of Asserted Prior Art," received on May 18, 2022.
4. Exhibit C contains true and correct copy of an email chain sent by TQD's Counsel to CommScope on August 11, 2022, identifying materials confirmed in depositions that have not been produced according to TQD's motion to compel.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 15th day of August 2022, in Dallas, Texas.

/s/ Rudolph Fink IV  
Rudolph Fink IV